

ARROW GEAR COMPANY

171023

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TO: J.J. Cervinka

FROM: R.H. Shapiro

cc: J.L. Arvin
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SUBJECT: Upcoming Storm Water Discharge regulations.

Effective October 1, 1992, the United States EPA will require permits for storm water associated with industrial activity. Any discharge to the state or municipal sewer is required to obtain a permit by this deadline. Storm water associated with industrial activity is defined as "the discharge from any conveyance which is used for collecting and conveying storm water and which is directly related to manufacturing, processing or raw materials storage areas at an industrial plant." For Arrow Gear, this includes manufactured products, waste material, material handling equipment, shipping and receiving areas, storage areas for raw materials, and intermediate and finished products. More simply stated, any material that has to do with our manufacturing processing and is stored outside and is subjected to ground water, is subject to these regulations. This includes all raw material, pallets, drums, tubs, and waste containers.

There are one of two options to comply with these regulations. The first option is to test our storm water and determine if it complies with the regulations (testing method to be discussed later), or, make sure that all our materials are not subjected to storm water, i.e. move everything indoors.

To obtain a five year permit, an extensive testing program is necessary to check our ground water for compliance with the regulations. Given below is a very condensed version of what is required to check our storm water runoff. It is required to provide quantitative data of our discharge collected during a storm event. We must collect what is termed a "grab sample," and a "flow weighted composite sample." These samples must be collected during a "typical" storm for the area in terms of intensity, volume, and duration. The storm must be at least 0.1 inches and must be preceded by 72 hours of dry weather and should not vary by more than 50% of an average rainfall. The grab sample must be collected during the first 30 minutes of the storm and the flow weighted composite sample must be collected during the entire storm. These

samples must then be analyzed to determine their pollutants. The flow weighted composite sample is a series of calculations based on flow and velocity in a pipe of known diameter. I recommend that if we choose to comply with the regulations and obtain a permit rather than move our materials indoors, that we hire an EPA approved lab to carry out the sampling and calculations.

October 1 is approaching quickly and we need to take action to comply with these regulations by that deadline. I am sure there will be many questions regarding these regulations and I will try to answer them to the best of my knowledge.

Rich Shapiro